

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

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January 13, 1999

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Notice of Preparation Comments Rowland Heights - Tentative Tract No. 49411

Dear Ms. Lam:

The Wildlife Corridor Conservation Authority (WCCA) offers the following Notice of Preparation comments on the above referenced project that proposes 55 single family homes on 170 acres located on the north-facing slope of the western Puente Hills.

The purpose of WCCA is to guide planning processes and to maximize the protection of wildlife corridors and habitat within the Whitter/Chino/Puente Hills natural area.

The subject property is a component of a large habitat block located between Harbor Boulevard and the 57 Freeway. The amount and quality of land that ultimately is protected in this subsection of the Puente Hills ecosystem will directly determine whether or not the currently present large and medium-bodied mammals, and numerous other smaller sensitive species, will persist in the area into the future. Currently, less than 20 percent of this habitat block is protected open space and less than three percent is permanently protected public open space.

The subject 170-acre project area includes some the most ecologically valuable north-slope woodland habitat in the entire Whitter/Puente Hills ecosystem. The Draft Environmental Impact Report (DEIR) should address both the high per-acre habitat value of this property and the commensurate high per-acre impacts for each acre converted to housing or that is otherwise disturbed, directly or indirectly.

We reiterate that the EIR must include both a map showing the relationship of the Ridgemoor lots to the proposed project and some analysis of how they could affect the ecology within the proposed open space lots in each of the EIR alternatives. The EIR must include a map with the closest natural year-round water source locations and how this Rowland Heights project, in light of other projects, would affect access for wildlife to utilize any such water sources.

While several of the figures are descriptive in the biology section of the DEIR, it is critical to show on the same figure the project impact area (including location of proposed residential development, grading boundaries, and brush clearance zone) overlain with vegetation communities, including tree locations. Without this information, decision-makers cannot adequately understand the project impacts.

In addition, visual impacts of the fire department-required brush clearance zone around each DEIR alternative should be addressed in the EIR.

DEIR Alternatives

The project's anticipated significant land use, topography, and biology impacts, warrant a complete and thorough analysis of alternatives to maximize avoidance of significant environmental impacts. The DEIR is deficient for not including an alternative that clusters the project closer to existing development, and for not addressing potential offsite alternatives. We suggested several alternatives in our January 13, 1999, letter, which should be considered in the EIR. If an alternative with fewer biological and environmental impacts is deemed "economically infeasible," that determination must be economically supported in the EIR. WCCA's January 13, 1999 letter recommends other alternatives that include reduced density (i.e., 34 lots instead of 55) and limiting the development footprint to the western portion of the currently proposed project.

Open Space Issues

After alternatives have been considered based on reducing impacts to biological and other environmental resources, we agree with the intent of mitigation measure B-4 (p. 6-44) which states that prior to issuance of a grading permit, a conservation easement would be placed over the open space area. However, to provide adequate long term protection of ecological and visual resources, the open space must be dedicated in fee simple to a public park agency with an overlapping conservation easement to Los Angeles County. WCCA would be interested in receiving this dedication. The conditions of approval must also include a guaranteed, permanent open space funding mechanism to provide for adequate maintenance and long term public benefit from the open space. In addition, a limited brush clearance easement should be granted to the homeowners association. These recommendations are expanded upon in our January 13, 1999 letter.

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October 26, 2001

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Mr. Kerwin Chih
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Draft Environmental Impact Report Rowland Heights - Tentative Tract 49411

Dear Mr. Chih:

The Wildlife Corridor Conservation Authority (WCCA) offers the following comments on the Draft Environmental Impact Report (DEIR) for the above referenced project. The proposed project consists of 55 single family homes and grading on approximately 45 acres (plus several acres of brush clearance) of a 170-acre site located on the north-facing slope of the western Puente Hills. In this letter, we reiterate several concerns that were raised in our January 13, 1999, letter on the Notice of Preparation for this project (see Enclosure), as it appears that many of our comments were not addressed. Our Governing Board will be considering adoption of an additional comment letter at its November 7, 2001, meeting.

The purpose of WCCA is to guide planning processes and to maximize the protection of wildlife corridors and habitat within the Whittier/Chino/Puente Hills natural area. Our January 13, 1999, letter describes the ecological significance of the project site, including its extensive woodland habitat and the importance of this area for mammals and other smaller sensitive species. We also stated that the site's regionally significant ecological resources and physical constraints make it most appropriate to approve a development alternative that minimizes adverse impacts to the property and thus the surrounding ecosystem. The DEIR does not include such an alternative.

As we stated in our January 13, 1999, letter, the Final EIR must provide a justification for why a change from Open Space to U1 (residential) on about 30 acres in the Rowland Heights Community Plan would be justified. According to the DEIR (p. 6-74), the purpose of the Rowland Heights Community Plan is "to specifically guide and manage growth within the Rowland Heights Community...while maintaining the rural character of the area." The EIR should provide a clarification of why

resources remaining on the 170-acre site (e.g., in the northern portion). Cumulatively, these impacts could be significant.

The increase in domestic pets and the possible effects to adjacent wildlife are noted in the DEIR (p. 6-38). This discussion must be expanded to include the full range of indirect effects that are expected to result from this project, including increased lighting. Clearly worded mitigation measures must be included in the DEIR to reduce the potential of adverse impacts from domestic pets, lighting, and other indirect effects. We concur with Mitigation Measure B-5.b. (DEIR, p. 6-44), but recommend that the underlined text be added: all native landscaping within the common areas of the project development shall be revegetated using only native and drought-tolerant species that are native to the local foothills. We also recommend that all plantings on the exposed slopes, landscaped areas, and for the oak/walnut restoration be from locally collected sources.

According to the DEIR (p. 6-43), relocation of animals from areas to be impacted is not an acceptable solution, because of the potential for increase competition and disease. It is not clear what is to be done with animals collected in the project area (e.g., the sensitive San Diego horned lizard [*Phrynosoma coronatum blainvillei*]).

As we point out in our two previous letters, these significant impacts to biological resources that would result from this project must also be considered in light of cumulative impacts from other projects (e.g., proposed AERA project).

Compatibility with Rowland Heights Community Plan

With respect to item (2) of the County's staff report, in our previous letters, we provided an analysis of why the project is inconsistent with the Rowland Heights Community Plan. Any change in this plan must be fully justified; the current DEIR does not provide this. Specifically, according to the plan, the areas designated as "Open Space" are intended to remain undeveloped for the life of the plan. According to the County's staff report "amendment of the open space category would be contrary to the Rowland Heights Plan objective of preserving a regionally significant open space corridor and the resources within it."

Impacts on Recreation

The EIR does not provide an analysis of the impacts of the proposed project on recreation. Would the equestrian facility continue to exist in the open space? Also, the DEIR should clarify the current use of trails in this area whether there would be visual impacts to trails. We recommend that impacts to trails be avoided.

aside for another project. The County's staff report points out that the subject 170-acre project was identified in several of the County's conditions of approval to be maintained as open space for Tentative Tract 34146. According to the County planner, the homes on Tentative Tract 34146 have already been built. Per the staff report, the developer assured the County that it would be permanently maintained. Also, no further subdivision of the property is permitted. It must be legally clarified if the construction restriction on the 170 acres was a temporary prohibition prior to moving forward with processing the California Environmental Quality Act (CEQA) document. If the applicant provides additional information as to why the subject 170-acre site is not in fact restricted from development permanently, this information must be clearly presented to the public.

Biological Resources

With respect to item (3) of the County's staff report, our previous letters identify the ecological significance of the subject 170-acre site. The subject project site is within an area proposed by the County's consultants to be included in a Significant Ecological Area. Significant oak and walnut woodlands exist on the project site and the proposed loss of 288 oaks (including five heritage oaks) and 17-27 walnuts represents a project incompatible with the resource. (We derive these numbers from the DEIR and from conversations with the developer's consultants. Within the DEIR [p. 1-7, 6-42], the number of oaks and walnuts that would be impacted is inconsistent. The CEQA document must accurately portray impacts to these and other sensitive biological resources. The DEIR also does not identify the number of heritage oaks to be impacted in the section describing impacts to oak and walnut woodlands.) Although restoration potentially could offset some impacts to these woodlands, the proposed project would result in a significant, unavoidable loss of oaks and walnuts and should be avoided.

In particular, oaks are slow-growing and a significant amount of time would pass before the restored sites would either resemble, or serve the same functions and values as, the impacted site. In addition, there is always the possibility of restoration failure. Often monitoring is required a set period of time (e.g., 3 or 5 years), and after that there may not be assurances that the plantings will be sustained. California walnut woodlands are considered highly threatened by the California Department of Fish and Game and are sensitive and declining within the Puente-Chino Hills. The ratio of two oaks to be planted for every oak to be impacted is too low. A ratio of 5:1 is more appropriate. We disagree with the statement that the loss of approximately 17-27 walnut trees would not result in a cumulative impact to biological resources. (The DEIR is incorrect in the statement that there is a Firestone Scout Reservation reserve for walnut woodlands. There is no evidence that this is a protected reserve.) We also recommend that restoration for loss of woodlands be conducted prior to project impacts.